

Judge ①	Recd Date	Grv.
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For use by inmates in filing a complaint under **CIVIL RIGHTS ACT, 42 USC §1983**

INMATE NAME: Bruce A. Estes, John W. East, Lawrence E. Combs

PRISONER NO.: 1185224, 1140794, 1407262

PLACE OF CONFINEMENT: River North Correctional Center **CLERK'S OFFICE U.S. DIST. COURT**
AT ROANOKE, VA
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

APR 07 2015

Bruce A. Estes
John W. East

JULIA C. DUDLEY, CLERK

BY:

S. Taylor
DEPUTY CLERK

Lawrence E. Combs
Enter Full Name

Plaintiff

VS. Harold Clarke Director VA Doc
Mark Engleke Food Service Director
M. Ponton Western Region Director
Warden B. Wright, J. Morrison Food Service RNCC
A. De Beret Asst. Food Service RNCC
Enter Full Name(s)

Defendant(s)

CIVIL ACTION NO. 715CV00154

A. Have you begun other actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

_____ Yes ☒ No

B. If your answer to A is Yes, describe the action in the space below.

1. Parties to the Action: _____

2. Court: _____

3. Docket No.: _____

4. Judge: _____

5. Disposition: _____

(For example, is the case still pending? If not, what was the ruling? Was the case appealed?)

C. Have you filed any grievances regarding the facts of your complaint?

Yes ☒ No _____

1. If your answer is Yes, complete the enclosed verified statement, indicating the result. Please attach evidence of your exhaustion of all available grievance procedures.

2. If your answer is No, indicate the reason for failure to exhaust on the verified statement. You may be required to exhaust your claims through any applicable grievance procedures. Your complaint may be dismissed if you fail to exhaust all avenues of the grievance process in a timely fashion.

- D. Statement of Claim - State here briefly the facts of your case. Describe what action(s) each defendant took in violation of your constitutional rights. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. Use as much space as needed. You may attach extra paper if necessary.

Claim #1 - Supporting Facts - Tell your story briefly without citing cases or law.

see attachment

Claim #2 - Supporting Facts - Tell your story briefly without citing cases or law.

see attachment

Claim #3 - Supporting Facts - Tell your story briefly without citing cases or law.

attachment

- E. State what relief you seek from the Court. Make no legal arguments, cite no cases or statutes.

see attachment

SIGNED THIS 26th DAY OF March, 20 15.

Bruce A. Estes
John W. East
Lawrence E. Combs

(Signature of Each Plaintiff)

VERIFICATION:

I, Bruce A. Estes, John W. East, Lawrence E. Combs, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 USC §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, three or more occasions, while incarcerated, brought an action or appeal in federal court that are dismissed on the grounds that it was frivolous, malicious or failed to state a claim upon which relief may be granted, unless the prisoner is in imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of filing fees.

I declare under penalty of perjury the foregoing to be true and correct.

DATED: 3-26-15 SIGNED: Bruce A. Estes, John W. East, Lawrence E. Combs

D.) Claim #1.

As Jewish inmates who follow the Biblical dietary laws and the Laws of Kashrut (Kosher). The dietary Laws established and required by our faith we need to have Kosher meals provided. Va D.O.C. doesn't provide Kosher meals. The current common fare diet provided does not meet the definition of Kosher and is in no way Kosher. Therefore we are being denied Religious meals required in the practice of our faith.

D.) Claim #2.

The denial of a Kosher diet is greatly hindered the practice of our faith because we are being forced to eat foods that do not meet our religious needs this creates an unnecessary burden on us and the practice of our faith.

D.) Claim #3.

We have provided food service with a copy of the Kosher dietary Laws in an attempt to resolve the issues however they continue to deny us a Kosher diet.

E.) our relief wanted.

For Va D.O.C. to follow all the laws of Kashrut in preparation of meals for Jewish inmates, provide Kosher meals for all three meals in the dining hall, For the Va D.O.C. to instruct Kefe Commissary to make Kosher meals available for purchase on a regular basis for those who can afford them.